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10 Attorneys for WAYMO LLC

11 UNITED STATES DISTRICT COURT

12 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

13 WAYMO LLC,

14 CASE NO. 3:17-cv-00939-WHA

15 Plaintiff,

16 **DECLARATION OF FELIPE
CORREDOR IN SUPPORT OF
DEFENDANTS UBER TECHNOLOGIES,
INC.'S AND OTTOMOTTO LLC'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL THEIR PRECIS IN
SUPPORT OF REQUEST TO FILE
MOTION IN LIMINE TO EXCLUDE
TESTIMONY AND OPINIONS OF
WAYMO EXPERT LAMBERTUS
HESSELINK OPINION ON TS 25**

17 vs.

18 UBER TECHNOLOGIES, INC.;
OTTOMOTTO LLC; OTTO TRUCKING
LLC,

19 Defendants.

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1 I, Felipe Corredor, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
 3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,
 4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set
 5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Defendants Uber Technologies, Inc.’s and
 7 Ottomotto LLC’s Administrative Motion to File Under Seal Their Precis in Support of Request to File
 8 Motion in Limine to Exclude Testimony and Opinions of Waymo Expert Lambertus Hesselink
 9 Opinion on TS 25 (the “Administrative Motion”). The Administrative Motion seeks an order sealing
 10 highlighted portions of Defendants’ Precis in Support of Request to File Motion in Limine (“Uber’s
 11 Precis”).

12 3. The highlighted portions of Uber’s Precis contain or refer to trade secret information,
 13 which Waymo seeks to seal.

14 4. Uber’s Precis (green and blue highlighted portions as well as images contained within
 15 green and blue boxes) contains, references, and/or describes Waymo’s asserted trade secrets, including
 16 as misappropriated by Defendants, or information that, from context, tends to disclose Waymo’s
 17 asserted secrets. The information Waymo seeks to seal includes the confidential design and
 18 functionality of Waymo’s proprietary autonomous vehicle system, including its technical
 19 specifications and/or LiDAR designs, which Waymo maintains as secret. I understand that these trade
 20 secrets are maintained as secret by Waymo (Dkt. 25-47) and that the trade secrets are valuable to
 21 Waymo’s business (Dkt. 25-31). The public disclosure of this information would give Waymo’s
 22 competitors access to descriptions of the functionality or features of Waymo’s autonomous vehicle
 23 system. If such information were made public, I understand that Waymo’s competitive standing
 24 would be significantly harmed.

25 5. Waymo’s request to seal is narrowly tailored to those portions of Uber’s Precis that
 26 merit sealing.

1 I declare under penalty of perjury under the laws of the State of California and the United
2 States of America that the foregoing is true and correct, and that this declaration was executed in San
3 Francisco, California, on November 14, 2017.

4 By /s/ Felipe Corredor
5 Felipe Corredor
6 Attorneys for WAYMO LLC

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8 **ATTESTATION**

9 In accordance with Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this
10 document has been obtained from Felipe Corredor.

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12 By: /s/ Charles K. Verhoeven
13 Charles K. Verhoeven
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